

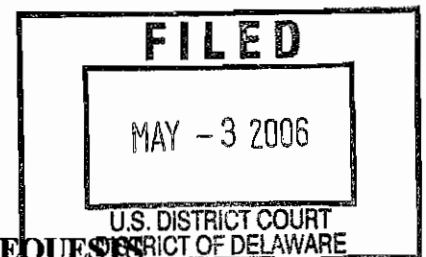
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**JANET LEIGH FRANKLIN, Plaintiff,**

**C.A. No. 04-1513 CMS**

**vs.**

**MBNA CORP, Defendant.**



**PLAINTIFF'S FIRST SET OF DOCUMENT REQUESTS**

*no scanned*

Pursuant to Rule 34 of Federal Rules of Civil Procedure, plaintiff, (Janet L. Franklin ) requests that you produce to the undersigned Plaintiff for inspection and copying the following documents.

You must respond within 30 days after the date this request is served upon you.

**DEFINITIONS**

A. "You" and "your" includes Defendant (MBNA) and any and all persons or entities acting or purporting to act on her behalf.

B. The word "document" has the broadest meaning that can be ascribed to it pursuant to Rule 34 of the Federal Rules of Civil Procedure. Among other things, the phrase refers to and includes the final form and all drafts and revisions of any type of written or graphic matter, original or reproduced, however produced or reproduced, of any kind and of every kind, and all copies thereof that are different in any way from the original, regardless of whether different by reason of any notation made on such copies or otherwise, or whether designed "confidential," "privileged," or otherwise restricted. Without limiting the generality of the foregoing, "document" includes correspondence, records, tables, memoranda, notes, diaries, statistics, communications, letters, telegrams, minutes, messages, contracts, reports, studies, ledgers,

checks, statements, receipts, returns, summaries, pamphlets, books, journals, purchase orders, invoices, publications, inter-office and intra-office communications, notations of any sort of conversations, telephone calls, meetings or other communications, bulletins, printed matter, computer print-outs, teletypes, telefax, invoices, work sheets, all drafts, oral records, or representations of any kind (including without limitation photographs, charts, graphs, schedules, reports, drawings, data compilations, microfiche, microfilm, videotapes, recordings, motion pictures), and any electronic, mechanical, or electric records or representations of any kind including without limitation, tapes, cassettes, discs, recordings, computer memories, or any other recorded information of any kind whatsoever, within your knowledge, possession, custody, control, or subject to your control, or accessible to you or your attorneys.

C. "Relate to," "related to," or "relating to" shall mean refer to, reflect, record, describe or be in any other way connected with the matter being discussed.

### **INSTRUCTIONS**

A. If you claim that any document, conversation, or other matter is privileged, for each such document, conversation, or other matter, state the following:

1. the type of document (e.g., letter, financial record, memorandum, etc.);
2. its date, if any;
3. its title, if any;
4. its originator, if any;
5. its addressee, if any;
6. its present location;
7. the person or persons having possession, custody, or control of it; and
8. the facts and circumstances that you contend create a privilege.

B. If any of the documents requested below have been destroyed or otherwise discarded, you are requested to identify the documents destroyed or discarded in the same manner as identification is requested for privileged documents.

C. Identify the request or requests for which each documents was produced.

D. Please note that you must supplement your response to this document request a required by the Federal Rules of Civil Procedure.

**DOCUMENT REQUESTS**

1. Show all documents that you believe disprove the plaintiff's claim that the Defendant discriminated against her based on her disability.

RESPONSE:

2. All statements that you or anyone acting on your behalf has taken relating to this action.  
RESPONSE:

3. All documents that were prepared by you and provided to Plaintiff.

RESPONSE:

4. All documents in your possession or under the control or accessible to you or *your* agents that were created by, prepared by, or related to Plaintiff (such as reviews and performances) dating back 10 years.

RESPONSE:

5. All memoranda, reports, correspondence, or other documents that you or your Defendant have sent to or received from each person whom you have contacted regarding the possibility of presenting evidence at trial as an expert witness.

RESPONSE:

6. All resumes and curriculum vitae of all persons you may call as an expert witness at trial.

RESPONSE:

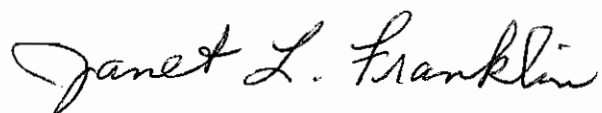


7. All documents that you referred to, identified, or used in any way in answering Plaintiff's First Set of Interrogatories.

RESPONSE:

8. All complaints, petitions, charges, answers, deposition transcripts, discovery responses, affidavits, statements, determinations, orders, judgments, and agreements relating to any criminal, civil, or administrative action brought by you or against any witness that will be testifying on your behalf.

**RESPONSE:**

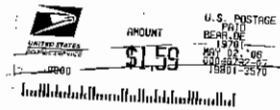
A handwritten signature in black ink that reads "Janet L. Franklin". The script is cursive and fluid, with the first name "Janet" and last name "Franklin" clearly legible.

**JANET LEIGH FRANKLIN (pro se)**

**phone: 302-222-0986**

**Dated: May 1, 2006**

Janet Franklin  
P.O. Box 580  
Bear, DE. 19701



U.S.M.S.  
X-RAY

FIRST CLASS

readyPost®

To: Office of the Clerk  
United States District  
Court  
544 N. King St., Lockbox 18  
Wilmington, DE. 19801-3570